

THOMPSON LAW, LLC

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Attorney for Pacific Rim Land Development, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

**PACIFIC RIM LAND DEVELOPMENT,
LLC,**

Plaintiff,

vs.

**IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,**

Defendant.

Case No. 1:19-cv-00016

**DECLARATION OF COLIN M.
THOMPSON IN SUPPORT OF PACIFIC
RIM LAND DEVELOPMENT, LLC'S
THIRD APPLICATION FOR WRIT OF
EXECUTION**

I, Colin M. Thompson, make the following statements in support of Pacific Rim Land Development, LLC's Application for Writ of Execution:

1. I am over the age of eighteen, competent to make this declaration, and all statements made in this declaration are made based on my personal knowledge unless specifically indicated otherwise.
2. I am the attorney for Pacific Rim Land Development, LLC ("Pacific Rim").
3. On May 28, 2020, the Court granted an Amended Judgement in a Civil Action [ECF 133] for Imperial Pacific International (CNMI), LLC to pay Pacific Rim Six Million Nine Hundred Nine Thousand Three Hundred Thirty-Three and 43/100 (\$6,909,333.43 USD).

- 1 4. As provided in 26 U.S.C. § 1961, post-judgment interest, accruing on the
2 Judgment on May 28, 2020
- 3 5. On May 8, 2020, I contacted Attorney for IPI, Denny Nie, to demand payment for
4 the Judgment.
- 5 6. Attorney Michael Dotts responded on May 8, 2020 and informed me that IPI
6 would seek a stay on the enforcement of Judgment. IPI did not offer to pay the
7 judgment.
- 8 7. Since May 8, 2020, IPI has not expressed to me that it intends to pay the
9 Judgment voluntarily.
- 10 8. IPI has not paid any sum due under the Judgment.
- 11 9. Upon information and belief, IPI possesses accounts valuable fixtures, furniture,
12 equipment, cash and vehicles in the Imperial Pacific Resort & Casino located in
13 Garapan, Saipan.
- 14 10. Attached as **Exhibit A** is a list of vehicles owned and controlled by Imperial
15 Pacific International (CNMI), LLC and/or it's subsidiaries.
- 16 11. Upon information and belief, the items are located in the Imperial Pacific Resort
17 & Casino situated in the Commonwealth of the Northern Mariana Islands.

18
19 I declare under the penalty of perjury that the above statements are true to the best of my
20 knowledge and that this declaration was signed on June 16, 2020 on Saipan, Commonwealth of
21 the Northern Mariana Islands.

22
23
24 /s/ Colin M. Thompson
25 **THOMPSON LAW, LLC**
Colin M. Thompson

Imperial Pacific International (CNMI), LLC
Vehicles and Heavy Equipment

No.	License Plate	Make	Model	Color
1	BUS595	THOMAS	BUS	BLUE
2	BEST06	LINCOLN	LIMOUSINE	BLACK
3	HE3549	HOWOA1		BLACK
4	BUS597	THOMAS	BUS	BLUE
5	HE3517	HYUNDAI	BOOM TRUCK	WHITE
6	HE3550	HOWOA1		BLACK
7	HE3519	ZOOMLION	CRANE	GREEN/GRAY
8	BEST20		VAN	BLACK
9	BEST07		LIMOUSINE	BLACK
10	BEST30		VAN	BLACK
11	BEST28		VAN	BLACK
12	AFC191	NISSAN QUEST	VAN	WHITE
13	BUS534		VAN	RED
14	BEST32		VAN	BLACK
15	BEST22		HAMMER	BLACK
16	HE3545	HOWOA7	TRAILER TRUCK	BLACK
17	BUS1414	STAR CRAFT	BUS	WHITE
18	HE3496	HOWOA7	TRAILER TRUCK	BLACK
19	HE3495	HOWOA7	TRAILER TRUCK	BLACK
20	HE3548	HOWOA7	TRAILER TRUCK	BLACK
21	BEST888		SEDAN	WHITE
22	UNKNOWN	UNKNOWN	FLAT BED	BLACK
23	UNKNOWN	UNKNOWN	BACKHOE	YELLOW
24	UNKNOWN	UNKNOWN	DUMPTRUCK	RED
25	UNKNOWN	UNKNOWN	FORKLIFT	ORANGE
26	UNKNOWN	UNKNOWN	VAN	WHITE
27	UNKNOWN	UNKNOWN	WATER TRUCK	ORANGE
28	UNKNOWN	UNKNOWN	FORKLIFT	ORANGE
29	UNKNOWN	HOWO	BOOM TRUCK	WHITE
30	UNKNOWN	UNKNOWN	CONCRETE PUMP	WHITE/ORANGE
31	BEST26			
32	BEST39			
33	BEST33			
34	BEST88			
35	BEST08			
36	BEST36			
37	BEST05			
38	BEST27			
39	BEST12			

EXHIBIT A



























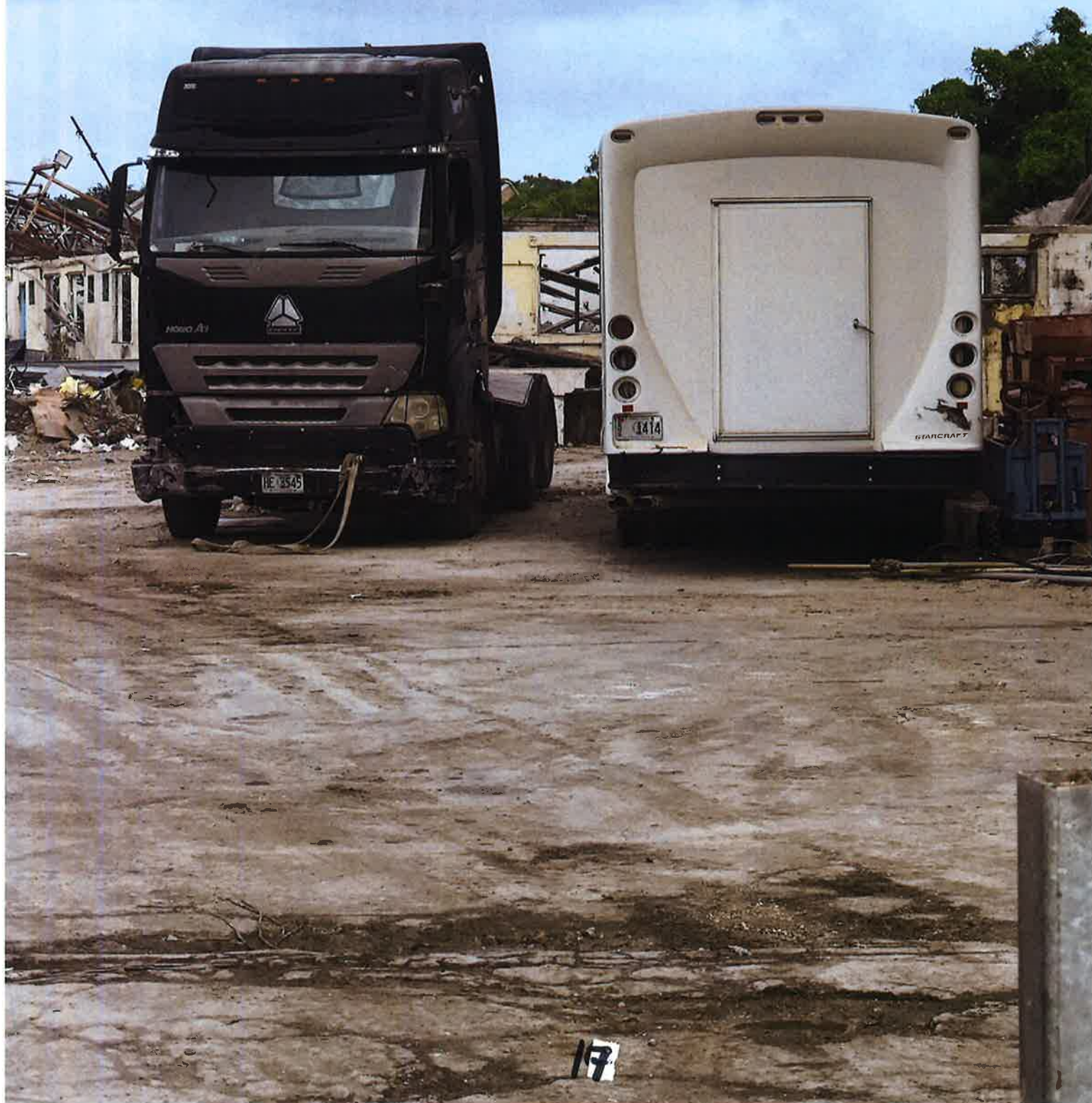


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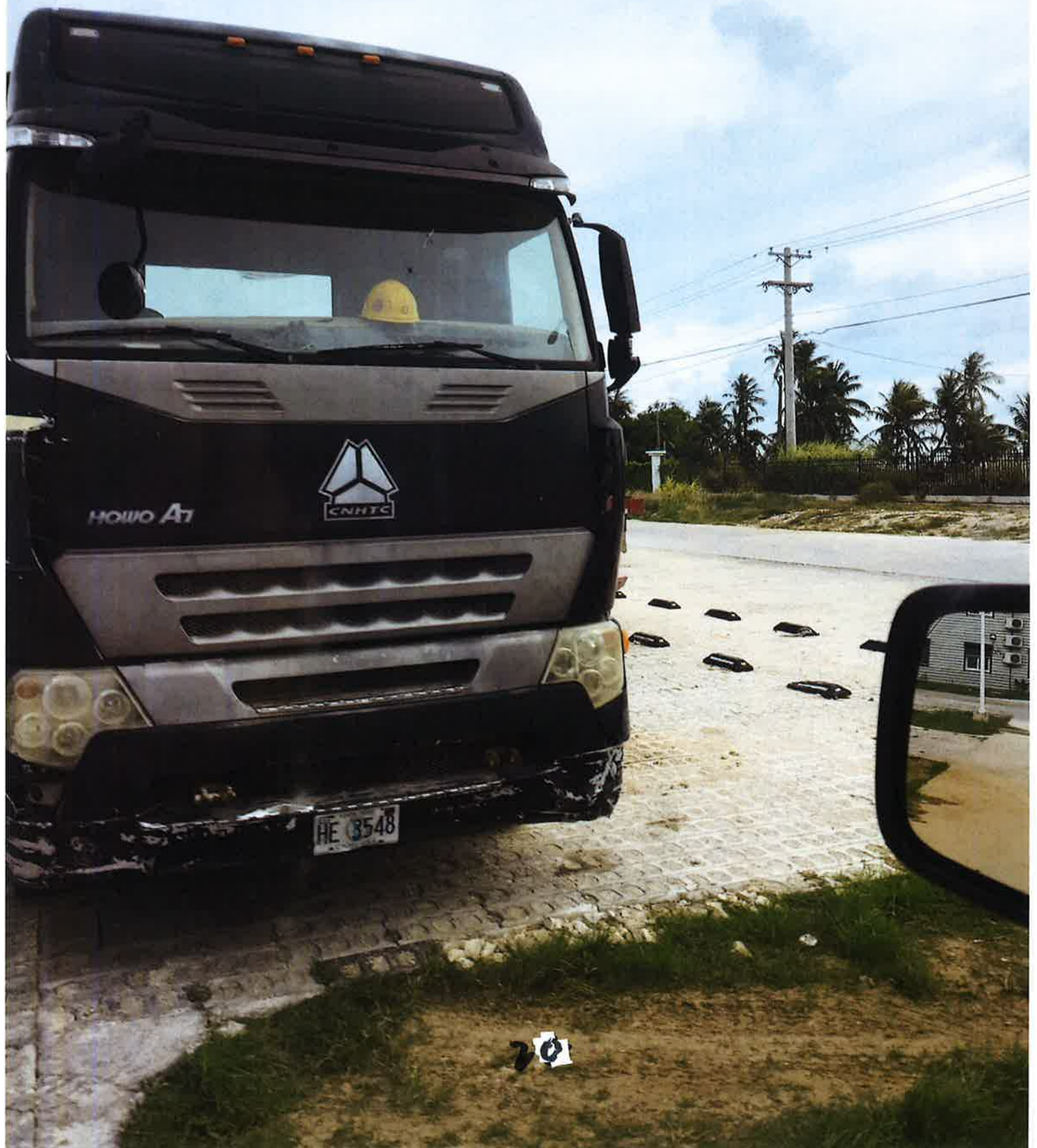
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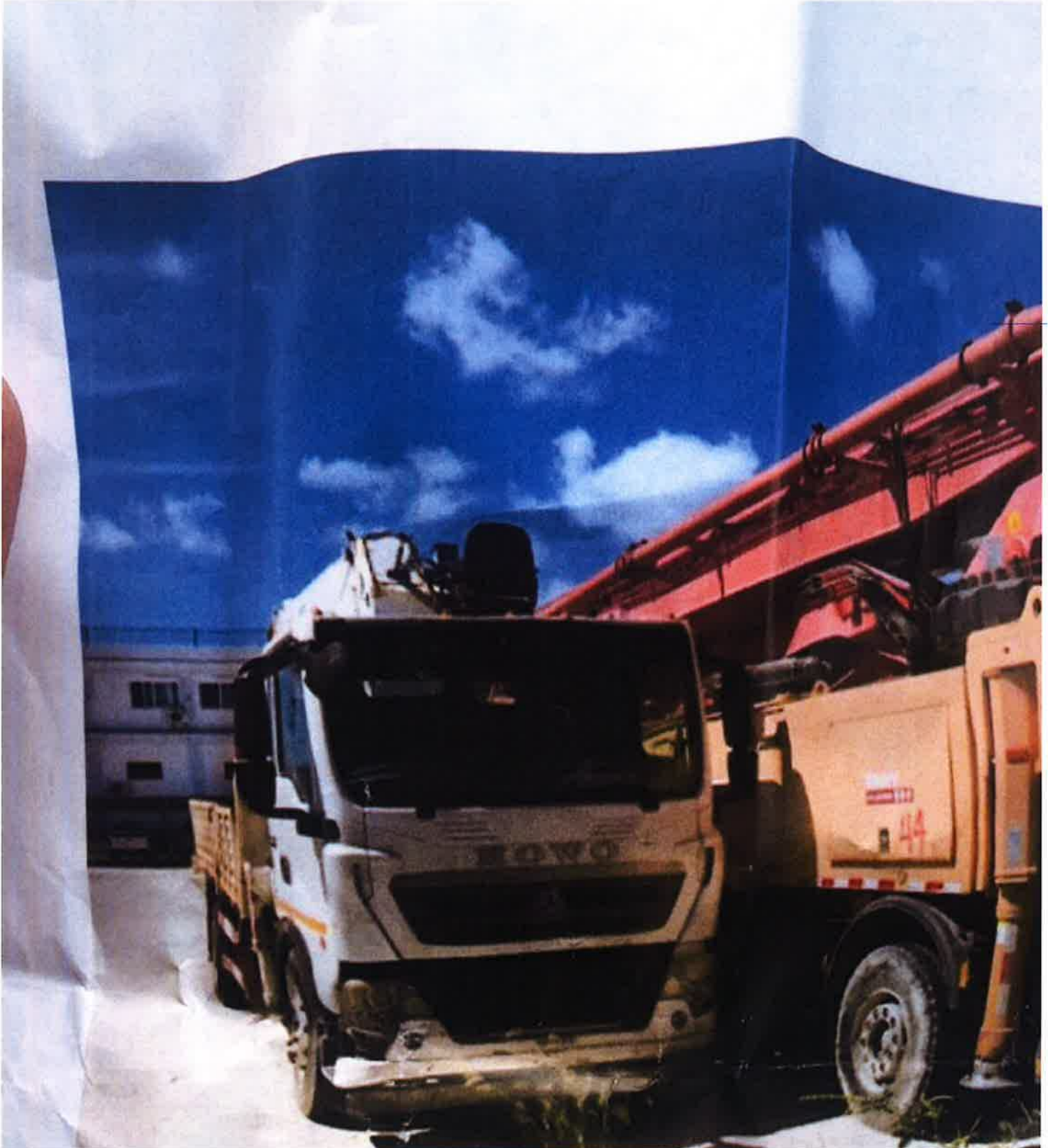






Eloisa San Nicolas

From: Eloisa San nicolas <sannicolas.eloisa@gmail.com>
Sent: Monday, June 15, 2020 6:31 PM
To: Eloisa San Nicolas



Eloisa San Nicolas

From: Eloisa San nicolas <sannicolas.eloisa@gmail.com>
Sent: Monday, June 15, 2020 6:30 PM
To: Eloisa San Nicolas

